

1 **SAO**

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2 Nevada Bar No. 8111

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7 Attorneys for Plaintiff

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 JUDY DONATELL, individually; JUDY
11 DONATELL, as Special Administrator of the
12 Estate of ANGELA DAWN DONATELL,
13 deceased; JUDY DONATELL, as the
Guardian Ad Litem for X.M., a
minor, under 14 years of age,

14 Plaintiffs,

15 v.

16 THE CITY OF LAS VEGAS, a political
17 subdivision of the State of Nevada; *et al.*

18 Defendants

CASE NO.: 2:15-CV-02334-RFB-NJK

**STIPULATION AND ORDER TO
EXTEND THE TIME FOR PLAINTIFF
TO FILE OPPOSITION TO
DEFENDANT CITY OF LAS VEGAS'
MOTION FOR SUMMARY
JUDGEMENT [ECF 112]
(FORTH REQUEST)**

19 COMES NOW Plaintiff, JUDY DONATELL, INDIVIDUALLY; JUDY DONATELL, AS
20 THE SPECIAL ADMINISTRATOR OF THE ESTATE OF ANGELA DAWN DONATELL
21 DECEASED; JUDY DONATELL, AS THE GUARDIAN AD LITEM FOR X.M., A MINOR,
22 UNDER 14 YEARS OF AGE ("Plaintiff") and Defendants CITY OF LAS VEGAS, MICHELE
23 FREEMAN, LIEUTENANT RUSSELL, SERGEANT AVILA, SERGEANT M. BUNNELL,
24 SERGEANT B. BYARD, OFFICER R. DORADO, OFFICER AMANDA CHALMERS,
25 OFFICER TRACEY VALENZUELA, OFFICER A. KNIGHT, OFFICER JONATHAN
26 McCORMICK, OFFICER ALGIN BROOKS, OFFICER RAMON BROOKINS, OFFICER
27 YANNIS GIRON, OFFICER LANDROVE, OFFICER BLEDSOE, OFFICER RANDALL
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1 (“Defendant City of Las Vegas), by and through their undersigned counsel of record, and hereby
2 jointly stipulate that the Plaintiff’s Opposition to Defendant City of Las Vegas’ Motion for
3 Summary Judgment, filed on August 24, 2017 [ECF 112], currently due January 2, be extended an
4 additional (30) days up to and including Tuesday, January 30, 2018.

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6 On November 3, 2017, this Court granted 60-day extension of time for Plaintiff to file her
7 Oppositions to Defendant City of Las Vegas’ Motion for Summary Judgment [EFC 112] and
8 Defendants Correct Care Solutions, *et al.*’s (“Defendant CCS”) Motion for Summary Judgment
9 [EFC 113] to allow Plaintiff’s counsel to obtain the entire care file from the former counsel’s
10 office. While the entire case file was obtained on or about December 4, 2017, and Plaintiff’s
11 counsel diligently working on responding to Defendant City of Las Vegas’ Motion for Summary
12 Judgment, Plaintiffs’ counsel has been unable to complete the Response due to a family tragedy.
13 Plaintiff’s counsel, however, will timely file Plaintiff’s Opposition to Defendant CCS’ Motion for
14 Summary Judgment. [EFC 113]
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1 This request for extension is made in good faith and not for the purpose of delay.

2 WHEREFORE, the parties respectfully request that Plaintiff's Opposition to Defendant
3 City of Las Vegas' Motion for Summary Judgment be extended an additional (30) thirty days up to
4 including Tuesday, January 30, 2018.

5 APPROVED AS TO FORM AND CONTENT.


6 Dated this 28th day of December 28, 2017. Dated this 28th day of December 28, 2017.

7 GANZ & HAUF LAS VEGAS CITY ATTORNEY

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10 /s/ Jeffrey L. Galliher
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/s/ Philip R. Byrnes
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Attorney for CITY DEFENDANTS

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16 ORDER
17 IT IS SO ORDERED.
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RICHARD F. BOULWARE, II
United States District Judge
DATED this 25th day of January, 2018.